

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA**

In Re: Asbestos Products  
Liability Litigation

JOHN E. HASKINS and MARY L. HASKINS,

Plaintiffs,

**C/A No. 2:15-CV-2086-DCN**

vs.

3M COMPANY, et al.,

Defendants.

**CONSENT MOTION FOR DISMISSAL OF  
FMC CORPORATION  
MCNALLY INDUSTRIES, INC.**

Pursuant to Rule 41, Federal Rules of Civil Procedure, Defendants FMC Corporation, on behalf of its former Northern pump business, improperly sued as “FMC Corporation, individually and as successor in interest to Northern Pump Company”, and McNally Industries, Inc., with the consent of Plaintiffs John E. Haskins and Mary L. Haskins, move this court for an order of dismissal with prejudice as to FMC Corporation, on behalf of its former Northern pump business, improperly sued as “FMC Corporation, individually and as successor in interest to Northern Pump Company”, and McNally Industries, Inc., each party to bear its own costs.

[SIGNATURE BLOCK FOLLOWS]

WE SO MOVE:

/s/ Moffatt G. McDonald  
Moffatt G. McDonald, No. 02805  
Scott E. Frick, No. 09417  
W. David Conner, No. 05986  
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Attorneys for Defendants FMC Corporation,  
on behalf of its former Northern pump business,  
improperly sued as “FMC Corporation, individually  
and as successor in interest to Northern Pump  
Company”, and McNally Industries, Inc.

WE CONSENT:

/s/ W. Christopher Swett  
W. Christopher Swett, No. 11177  
Motley Rice LLC  
P. O. Box 650001  
Mt. Pleasant, SC 29465  
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2017, the foregoing was electronically filed with the Clerk of the Court using the CM-ECF system. Notification of such filing was given to the following by the CM-ECF system to those registered to receive a Notice of Electronic Filing for this case:

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Defense Counsel of Record

/s/ Moffatt G. McDonald